

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

PR Docket No. 93-85

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In the matter of  
Amendment of Part 97 of the  
Commission's Rules Concerning  
Message Forwarding Systems in  
the Amateur Service.

JUN 28 1993

RM-7649 RM-7669  
RM-7675 RM-7676  
RM-7681 RM-7904

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COMMENTS ON NOTICE OF PROPOSED RULE MAKING

The Commission is to be commended for the proposed rewrite of the definition of "Repeater", which incidentally eliminates the contention held by some that presently operating digital "Nodes" or "Digipeaters" may, in some cases, fit the present definition (and associated restrictions) of repeater operation, notwithstanding the contention expressed by some that stations in digital operation are neither in "Repeater" (or "Auxiliary", comments to follow) operation.

The contemporary application of "Repeater" does not include amateur stations who are engaged in what the proposed new definition identifies as a "Message Forwarding System". Such stations are usually operated using digital packet radio communications.

The proposed rewrite of the repeater definition facilitates the newly identified "Message Forwarding System" concept by restricting the definition of "Repeater" to "the retransmission on a different channel the angle-modulated phone or image transmission of another amateur station". This excludes data and single-channel retransmissions from the definition of "repeater" operation.

To further the facilitation of the newly defined "Message Forwarding System", similarly the Auxiliary station definition should be modified, as would be the Repeater definition, to exclude message forwarding system stations from that definition as long as they are in message forwarding system

auxiliary station transmitters used to carry phone or image transmissions from multiple "remote receivers" to a repeater transmitter site).

Some point-to-point stations in message forwarding system operation, by the fact that they are point-to-point and not generally accessible, can be interpreted to fall under the present definition of auxiliary station. Thus such stations would be restricted to those frequencies of operation allocated for auxiliary operation. As there are no frequencies below the 1.25 m band authorized by section 97.201 of the Commissions rules for auxiliary station operation, a strict interpretation of the auxiliary station definition and applicable rules could hamper message forwarding system operation. I do not believe this to be the Commission's intention, and I will propose a wording change to further clarify the to be newly defined message forwarding system operation.

I propose that the Auxiliary station definition be changed to read as follows:

97.3 (7) Auxiliary Station. An amateur station, other than one in message forwarding system operation, transmitting communications point-to-point within a system of cooperating amateur stations.

I am aware of comments by some repeater operators (in non-data mode operation) that the Commission's proposed rewording could hamper some existing or planned repeater operations that are permitted by the existing repeater definition. Should the commission agree with those comments, I suggest that the repeater definition could be restated as follows, in keeping with my proposal for the auxiliary station definition:

97.3 (36) Repeater. An amateur station, other than one in message forwarding system operation, that automatically retransmits the signals of other stations.

This would preserve the existing wording and all existing operations, while at the same time specifically exempting stations operating as stations in the to be newly defined message forwarding system.

I am commenting as a "node SYSOP" in the Northern California/Northern Nevada "DX Packet Spotting Network". The proposed wording has a direct impact on our present and future message forwarding system operation. Your consideration of my comments is appreciated.

Respectfully submitted,

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6/21/92